

1           A     Yes, I am.

2           Q     Looking at the first paragraph of that  
3 document, does it not identify Atlantic Pacific  
4 Broadcasting Inc., a Delaware corporation, as a limited  
5 partner of JEM Productions LP?

6           A     Yes, that's Robin Rothschild.

7           Q     And when you say, that's Robin Rothschild, do  
8 you mean that Robin Rothschild owned 100 percent of  
9 Atlantic Pacific Broadcasting, Inc.?

10          A     As far as I know.

11          Q     Do you ever see any corporate documents of  
12 Atlantic Pacific Broadcasting, Inc.?

13          A     No.

14          Q     Did you ever seen anything showing the  
15 ownership, any written documents showing the ownership  
16 of Atlantic Pacific Broadcasting, Inc.?

17          A     No, I did not.

18          Q     Upon what basis do you determine that  
19 Atlantic Pacific Broadcasting Inc. was 100 percent  
20 owned by Robin Rothschild?

21          A     Because that's what was presented back to me  
22 on the 26th of February with Robin and with Peter.  
23 Peter was Baylan and Robin was Atlantic Pacific.

24          Q     Okay. Do you know if Atlantic Pacific  
25 Broadcasting Inc. has any other business interests?

1           A     I think they do.

2           Q     You think they do?  What business interests  
3 do you believe Atlantic Pacific has?

4           A     I think they have, number one, Robin's radio  
5 station up in Vermont.

6           Q     Is that WAVY-FM?

7           A     Yes.

8           Q     In Wilmington, Vermont?

9           A     Yes.

10          Q     And you believe Atlantic Pacific Broadcasting  
11 Inc. owns that station?

12          A     Robin Rothschild does.

13          Q     Okay.  I direct your attention to Peaches  
14 Exhibit number 17, which is previously received.

15          A     Please tell me what it is.  Mine is not --

16          Q     That's the page from your application.

17          A     Does it say ownership information?

18          Q     Legal qualifications of the --

19          A     Here it is.

20          Q     I direct your attention, Ms. Morgan, to the  
21 bottom -- to the right column of that document, line  
22 number 7, column 3.

23                   Do you see that?

24          A     Yes, I do.

25          Q     It refers to WAVY, Wilmington, Vermont.

1           A     Yes, I do.

2           Q     Okay. It states that Robin Rothschild owns  
3     89 percent of that station?

4           A     Oh, that's right. I see that.

5           Q     Okay. Do you know who owns the other 11  
6     percent of that station?

7           A     I think her husband does, her ex-husband.

8           Q     Okay. So that if Atlantic Pacific  
9     Broadcasting Inc. is, in fact, a company that owns  
10    WAVY-FM, then would that indicate that when Atlantic  
11    Pacific Broadcasting Inc. was a limited partner of JEM  
12    Productions LP, that in fact, Ms. Rothschild's husband  
13    owned 11 percent of that interest?

14          A     That could be.

15          Q     You don't know that for a fact, though?

16          A     I don't know it for a fact.

17          Q     Ms. Morgan, is Mr. Knobel -- this may have  
18    been asked -- is Mr. Knobel an applicant for other  
19    broadcast facilities?

20          A     Is he part of other applications, yes.

21          Q     And how many other applications does he  
22    currently involved in?

23          A     I think about three.

24          Q     Do you know if Mr. Knobel has any financial  
25    obligations to those other applicants?

1 A Yes, he does.

2 Q When did you learn that?

3 A When did I learn that? Sometime last year.

4 Q Did he have any financial obligations from  
5 any other applications at the time you filed your  
6 application?

7 A Not to my knowledge.

8 Q So you didn't discuss that with him prior to  
9 the application being filed?

10 A No.

11 Q Ms. Morgan, you stated that Mr. Knobel is  
12 committed to make a loan to JEM Productions LP? Is  
13 that correct?

14 A That is correct.

15 Q Okay. And that loan is in the amount of  
16 \$250,000?

17 A That is correct.

18 Q And has Mr. Morgan ever made any loans to you  
19 personally in connection with the application?

20 A Personally?

21 Q Personally to you?

22 A What do you mean personally?

23 Q Has he lent money to you to pay your share of  
24 the application costs?

25 A No. My share of the application was, as

1       stated in the agreement, was \$1800 for the filing fee.  
2       So I don't think he's lent me money personally.

3               Q     Okay. When Mr. Knobel provides money to JEM  
4       Productions, how does he go about doing that?

5               A     He writes a check and then I write a check to  
6       pay whatever it is.

7               Q     And his check will be made to --

8               A     To Joyce Morgan.

9               Q     And you put it in your personal account?

10              A     And then I write a personal check.

11              Q     Okay. JEM has no bank account of it's own?

12              A     That's correct.

13              Q     And it's never had a bank account?

14              A     That's correct.

15              Q     Referring you back to the agreement of  
16       limited partnership of JEM Productions Limited  
17       Partners, looking at the document I just provided you,  
18       Northeast Florida number 8, the first page of the  
19       agreement of limited partnership, I'm not sure it's  
20       going to be necessary to -- well, I'll ask you and then  
21       I'll decide what we need to do.

22                    The exhibit that I referred to, it's just the  
23       first page of an extensive limited partnership  
24       agreement, is that correct?

25              A     That is correct.

1           Q     You're familiar with the limited partnership  
2 agreement itself in general terms?

3           A     Yes.

4           Q     Do you recall who prepared that agreement?

5           A     Who prepared the agreement?

6           Q     Yes. What attorney in particular?

7           A     Battle, Fowler -- I don't know the attorney's  
8 name.

9           Q     Okay. But you testified earlier that Battle,  
10 Fowler is Mr. Knobel's attorney, that firm represents  
11 Mr. Knobel, is that correct?

12          A     Correct. He uses that firm.

13          Q     So that it's fair to state that Mr. Knobel'  
14 law firm prepared your agreement of limited  
15 partnership, dated February 27, 1991?

16          A     That is correct.

17          Q     And would that also be true for the agreement  
18 of limited partnership dated May 2nd, 1991?

19          A     Yes, that's the same agreement with taking  
20 Robin Rothschild and Atlantic Pacific Broadcasting out  
21 and changing it to a 50-50 agreement.

22               MR. WINSTON: I believe I'm finished with  
23 this witness. No more questions, Your Honor.

24               JUDGE LUTON: White, do you have questions?

25               MR. WHITE: No questions, Your Honor.

1 MR. HALAGAO: I have a couple on redirect,  
2 Your Honor.

3 REDIRECT EXAMINATION

4 BY MR. HALAGAO:

5 Q Ms. Morgan, you testified about your civic  
6 involvement in Jacksonville, Florida. You mentioned  
7 some civic organizations that are not job-related.

8 Would you tell us how much time you have done  
9 with these organizations in your own words, please?

10 A When I said they're not job related --

11 MR. WINSTON: This goes beyond the scope of  
12 cross.

13 MR. HALAGAO: Your Honor, I think that was  
14 the -- that was one of the cross examination questions  
15 of Ms. Robinson.

16 JUDGE LUTON: Well, as I remember it, the  
17 cross examination did indeed have an identification of  
18 those activities which were not job related. But none  
19 of that cross examination had anything to do with the  
20 amount of time that the witness spent on those  
21 respective activities.

22 And your questions goes to the time and that  
23 can be an important matter in these cases and it's not  
24 stated in your direct as I glanced at it. And I  
25 believe that to permit you to inquire now in terms of

1 the time that's spent on these activities would permit  
2 you to supplement improperly the written direct.

3 In any event, I'm going to sustain the  
4 objection, because the question does go beyond the  
5 scope of the cross. The objection is sustained.

6 BY MR. HALAGAO:

7 Q Ms. Morgan, in your testimony that there were  
8 organizations that you identified as non-job related.  
9 Of all your civic activities in Jacksonville, what is  
10 the percentage of job-related and non-job-related in  
11 these organizations? You testified that and you named  
12 some of them as non-job related.

13 A The percentage of what's non-job related to  
14 me has to do with the actual time that you go to do all  
15 of this community work. My community work was never  
16 done on job time. My hours were from 3 to 11:30. I  
17 have to meet deadlines, so there's no way to do  
18 anything during job time.

19 All of my activities were done 8 o'clock in  
20 the morning, 12 noon luncheons, after I got off the 6  
21 o'clock news at 6:30, from 6:30 to 8:30, that was when  
22 I did all of my work with the organization of black  
23 communicators.

24 MR. WINSTON: I move to strike. It's non-  
25 responsive, Your Honor.

1 JUDGE LUTON: A percentage is what's being  
2 asked for.

3 BY MR. HALAGAO:

4 Q Ms. Morgan, you can possibly --

5 A I suppose in that respect then, it would be  
6 almost 95 percent.

7 Q Ms. Morgan, you testified that Mr. George  
8 Newton is your consultant, is that correct?

9 A That is correct.

10 Q When you first met Mr. Newton, did he give  
11 you some of a seminar on what the business was all  
12 about?

13 A Yes, he did.

14 Q Did he give you a lot of information about  
15 the process?

16 A Yes, he did.

17 JUDGE LUTON: You're asking leading  
18 questions.

19 MR. HALAGAO: I'm sorry, Your Honor.

20 BY MR. HALAGAO:

21 Q What did Mr. Newton give you when he --

22 A He gave me basically a packet that shows the  
23 different fees that the FCC charges for different  
24 things, the application fee, the hearing fee, that kind  
25 of thing. He gave me information about how to file,

1       how to do public notices, just a variety of information  
2       concerning how to go about filing an application with  
3       the FCC.

4               Q     Did Mr. Newton tell you about his previous --

5                     JUDGE LUTON:   That's another leading  
6       question.   It's going to come out leading.

7                     BY MR. HALAGAO:

8               Q     Okay.   What was Mr. Newton's employment at  
9       the time?

10                    MR. WINSTON:   Objection, Your Honor.   It's  
11       outside the scope of cross.

12                    JUDGE LUTON:   I'm going to view this one as  
13       introductory to something that's going to take us back  
14       into cross.   Overruled.

15                    THE WITNESS:   His current employment was a  
16       consultant.   His former employment was with the FCC.

17                    BY MR. HALAGAO:

18               Q     You testified that WAVY-FM might be owned by  
19       Atlantic Pacific, one of the limited partners in your  
20       regional or your February 1991 agreement, partnership  
21       agreement.

22               A     That is correct.

23               Q     You're not sure -- are you sure on that?

24               A     No, I'm not.   I assume that Atlantic is Robin  
25       Rothschild's.

1 Q But you're not sure.

2 MR. WINSTON: That's a leading question, Your  
3 Honor.

4 MR. HALAGAO: Well, Your Honor, I'm asking  
5 whether she's sure that the corporation owns the  
6 station?

7 JUDGE LUTON: I know, but there are ways to  
8 do it and there are ways not to do it. One of the ways  
9 not to do it is by asking leading questions.

10 BY MR. HALAGAO:

11 Q Okay, Ms. Morgan, I will skip that question,  
12 Your Honor.

13 Do you have your own attorney who reviewed  
14 the partnership agreement later on?

15 A The second partnership agreement, yes. My  
16 local attorney reviewed it.

17 JUDGE LUTON: Now that's leading. The  
18 witness could have been asked, more properly would have  
19 been asked, was her second limited partnership  
20 agreement reviewed by anyone, and if so, whom?

21 But you turned it into a leading question by  
22 suggesting to the witness the answer to the question,  
23 which is the one that she gave. Yes, my counsel  
24 reviewed it.

25 MR. HALAGAO: I will rephrase the question,

1 Your Honor.

2 JUDGE LUTON: I'm sorry?

3 MR. HALAGAO: I could rephrase the question.

4 JUDGE LUTON: Well, you've already gotten an  
5 answer to it. You might as well go on to the next one.

6 MR. HALAGAO: I think that's all I have.

7 JUDGE LUTON: All right. Recross?

8 RECROSS EXAMINATION

9 BY MS. ROBINSON:

10 Q Ms. Morgan, when you were asked about the  
11 percentage of times spent on your civic activities, was  
12 your answer prompted basically by the time spent  
13 outside of your working hours? You mentioned your  
14 working schedule.

15 A Correct.

16 Q So was that response in relation to the time  
17 spent outside of your working hours?

18 A I guess so, yes.

19 Q But, I'm not sure if that's addresses whether  
20 or not some of those activities were related to your  
21 role as a newscaster in the market, so could you  
22 clarify that?

23 A Well, first of all, one of the biggest  
24 reasons that any person calls me is because they know  
25 who I am, because I'm on television. It's very easy.

1                   The second reason they call you is because  
2                   they know you'll do it. You see, I don't have to do  
3                   any of it.

4                   Q     So, can I take your response as to mean that  
5                   your activities were prompted by requests by other  
6                   people?

7                   A     Some of them are. Like if I speak at  
8                   schools, of course, I wouldn't know that school was  
9                   having an activity if the school didn't call me.

10                   Some of the activities I initiated. For  
11                   instance, we did a career day seminar in, I think,  
12                   Lotte Middle School or Elementary or something. But I  
13                   initiated that in that I said, "why don't we do a  
14                   seminar. I can get several broadcasters to come in and  
15                   help on this."

16                   So in some instances --

17                   Q     Could we narrow down those instances that you  
18                   initiated specific activities?

19                   A     Oh, gosh.

20                   Q     Do you have your direct exhibit in front of  
21                   your?

22                   A     Let me see. Oh, that's a lot of time. That  
23                   is quite a time consuming task. Do you want me to go  
24                   down each list?

25                   Q     Just the first paragraph under your

1 experience?

2 A Yeah, that's what I mean. Try to go down  
3 each list and try to list out different committees or  
4 whatever I served on that I initiated the action to  
5 serve on. For instance, you're talking maybe with the  
6 United Way, where I was on the Board of Directors, but  
7 I served on the allocations committee because I said I  
8 wanted to serve.

9 JUDGE LUTON: What is the question?

10 MS. ROBINSON: The question -- her earlier  
11 answer alluded to an understanding that, when we asked  
12 our job relatedness, that it meant civic activities  
13 performed outside the time spent at the job, outside  
14 the hours. So I'm trying to narrow down those civic  
15 activities which she initiated, which were prompted by  
16 her interest in the community, as opposed to her being  
17 requested by some outside party. Those civic  
18 activities that she --

19 THE WITNESS: What I'm saying to you is do  
20 you want me to split them up into --

21 BY MS. ROBINSON:

22 Q No, just give me some samples or just a few  
23 examples.

24 MR. WINSTON: Your Honor, the problem I'm  
25 having is the answers tend to be non-responsive. They

1        seem to be supplementing her description of her civic  
2        activities as opposed to --

3                JUDGE LUTON: Care ought to be exercised in  
4        putting the questions to the witness in that event.

5                MR. WINSTON: I hear that concern, Your  
6        Honor. It appears that all we're getting is a  
7        supplement to the direct case, rather than a response  
8        to the question --

9                MS. ROBINSON: I'll withdraw it.

10               JUDGE LUTON: Well, the witness is doing the  
11        best she can with the questions that are put to her. I  
12        don't know what I'm supposed to do here.

13               BY MS. ROBINSON:

14               Q        Ms. Morgan, in the list of activities which  
15        are stated here, for example, the Jacksonville Urban  
16        League Auxiliary. Was that an activity that was  
17        initiated by you?

18               A        Yes.

19               MS. ROBINSON: Nothing further.

20               MR. WINSTON: No questions, Your Honor.

21               JUDGE LUTON: Next witness.

22               MR. HALAGAO: I'm calling on Mr. Knobel, Your  
23        Honor.

24

25

1       Whereupon,

2                               PETER B. KNOBEL

3       was called as a witness and, having first been duly  
4       sworn, was examined and testified as follows:

5                       JUDGE LUTON:   Please be seated.

6                               DIRECT EXAMINATION

7                       BY MR. HALAGAO:

8               Q     Mr. Knobel, would you please state your name,  
9       full name and address?

10            A     Peter Baylan Knobel, 239 Central Park West,  
11       New York City, New York.

12           Q     Mr. Knobel, what's your participation in the  
13       application of JEM Productions Limited Partnership?

14           A     A limited partner.

15           Q     And, how much is your participation or equity  
16       interest in this --

17           A     I have agreed to loan \$250,000 plus various  
18       capital.

19                   MR. HALAGAO:   Your Honor, I think Mr. Knobel  
20       is ready to have cross examination now.

21                   JUDGE LUTON:   That last question.   You asked  
22       for his equity interest.   It's 50 percent, isn't it?

23                   THE WITNESS:   It's 50 percent.

24                   JUDGE LUTON:   Cross.

25

## 1 CROSS EXAMINATION

2 BY MS. ROBINSON:

3 Q Good morning, Mr. Knobel.

4 A Good morning.

5 Q I think we've met before. My name is Rhonda  
6 Robinson and I'm appearing on behalf of Peaches  
7 Broadcasting.

8 How are you employed?

9 A How am I employed? I own various investment  
10 companies.11 Q And how did you come to know a gentlemen,  
12 Salvador Serrano?

13 A I met him through George Newton.

14 Q And how did you come to know George Newton?

15 A My wife's friend is his daughter.

16 Q Okay. What prompted your involvement in this  
17 particular application?18 A His daughter owns a radio station, WAVY in  
19 Vermont. I knew Robin Rothschild when she was a -- she  
20 used to be a work out teacher at health clubs in New  
21 York City. She is my wife's oldest friend. And she  
22 got to talking to us about radio stations.

23 Q And how did that lead to your involvement?

24 A My wife, George approached my wife or Robin  
25 had told my wife about an application in Montauk, Long

1       Island. We have a weekend home in Suffolk County,  
2       which is the county that Montauk is in. And Robin  
3       said, "wouldn't it be great if you owned the radio  
4       station." And also to my wife. My wife thought it  
5       would be a good idea.

6               George contacted me wife, came up to see my  
7       wife and educate her on what the possibilities were to  
8       owning a radio station and I got to listen, so I would  
9       pop in and out and then my wife discussed it with me  
10      and my wife applied for the radio station, the  
11      application.

12             Q     For which radio station?

13             A     The Montauk application.

14             Q     Okay, but as far as this application, how did  
15      you --

16             A     After my wife started working with George  
17      Newton, I got to know him better and better and said to  
18      George, maybe there would be other -- when I started to  
19      understand the program -- maybe there would be other  
20      applicants around the country who needed financing.

21                So George said that his business was going  
22      out and putting these projects together. I said,  
23      "well, when you find an applicant, have them call me  
24      and let me know whether they could use me as a  
25      prospect." And that's occurred in this situation.

1           Q     So that's what prompted finding Joyce Morgan,  
2     your request by them to --

3           A     No, I had no request. I said to George that  
4     I would be interested as an investor in other radio  
5     applications. And that I had no specific needs, say,  
6     Jacksonville or Oklahoma or Tennessee, wherever. If he  
7     had an applicant who was interested, that I would  
8     review who the applicant was and their qualifications  
9     and maybe I would become their financial partner.

10          Q     But they, in fact, found you Joyce Morgan?

11          A     Correct.

12          Q     What is the function of Mr. Serrano is this,  
13     besides what you've mentioned. Are there any  
14     additional roles that he's played?

15          A     Be more specific.

16          Q     What is his overall role in the application,  
17     Mr. Serrano, beside matching you with your partner. Do  
18     you know of any other --

19          A     I believe he's an engineer.

20          Q     An engineer?

21          A     Yes.

22          Q     Not in this particular application?

23          A     I don't specifically know.

24          Q     But as far as his particular role in this  
25     particular application, what is your knowledge of his

1           role?

2           A     Mr. Serrano's. I don't know.

3           Q     Okay. Are you familiar with your deposition  
4           which was taken earlier this year?

5           A     Yes.

6           Q     I'd like to read into the record some  
7           information. Maybe I can show it to you, too.

8           A     Sure.

9           Q     Pages 28 and 29.

10          A     Okay.

11          Q     Bottom of Page 28 and I'll just read  
12          pertinent parts of it.

13                JUDGE LUTON: No. Excuse me. That's not why  
14          we use depositions. Not everything that goes on at a  
15          deposition is relevant to a hearing. So to simply read  
16          it merely on your belief, you've got to go through the  
17          witness by putting questions to the witness.

18                MS. ROBINSON: Okay.

19                BY MS. ROBINSON:

20          Q     The portion regarding -- on the top of Page  
21          29, which reflects an answer. The question initially  
22          which was presented was relating to Joyce Morgan and I  
23          guess the only way to really make sense of this is to  
24          read it.

25                I wanted to find out, if, in fact, this was

1 accurate.

2 JUDGE LUTON: First of all, find out if it's  
3 the witnesses testimony. There's some little  
4 formalities you need to go through. Show the witness  
5 the deposition testimony and ask him if he recognizes  
6 it.

7 BY MS. ROBINSON:

8 Q Do you recognize it?

9 A What one?

10 Q Line 17 through 22 on Page 28. And lines 1  
11 through 5, Page 29.

12 A Okay.

13 MS. ROBINSON: Your Honor, now is it proper  
14 to read it into the record?

15 JUDGE LUTON: I don't think so.

16 MS. ROBINSON: I'm sorry.

17 JUDGE LUTON: I don't think so.

18 BY MS. ROBINSON:

19 Q Okay, is that an accurate statement or what  
20 you said on that date?

21 JUDGE LUTON: Ask the witness the question  
22 you asked him at deposition. And then ask him if  
23 that's his response.

24 MS. ROBINSON: That is what I intended to do,  
25 Your Honor.

1 BY MS. ROBINSON:

2 Q Okay, the question which is stated here is,  
3 starting from line 17 and it relates to Serrano. Did  
4 he tell you how he came to know Joyce Morgan?

5 Answer: I don't know how. I don't know.

6 A It doesn't relate to Serrano. It relates to  
7 George Newton.

8 Q I'm sorry, George Newton. I'm sorry.

9 A You didn't ask me anything about George  
10 Newton.

11 Q Well, I'm asking you now. This relates to  
12 George Newton? I wanted to know if this was, in fact,  
13 an accurate statement of what was said during the  
14 deposition?

15 A Semi-accurate.

16 Q Okay, why don't I continue to read it. Do  
17 you know if he told you if he drove into Jacksonville  
18 and saw her face on a billboard and drove to the  
19 station to find out if she wanted to own a radio  
20 station?

21 Answer: She has a pretty face. I guess he  
22 finds pretty faces and asks them if they want to own a  
23 radio station.

24 Question: Did he tell you that is what  
25 happened in this case.

1                   Answer: Not in those words.

2                   Is that an accurate account of what was told  
3 to you by Mr. Newton of what you stated during the  
4 deposition?

5                   A     I think you have to continue because the next  
6 line says, not in those words and then the next line  
7 says, what words did he use? So --

8                   Q     Okay, so how far down would you like to  
9 continue to clarify that? What was your -- okay, I'll  
10 restate that.

11                  A     I said he has an applicant who was interested  
12 in owning and building a radio station. Would I be  
13 interested in becoming her partner. I said I would  
14 like to speak to her and meet her and I would let him  
15 know after that.

16                  Q     Okay. So what prompted your comments, if  
17 this is, in fact, an accurate reflection?

18                  A     Did he have a pretty face?

19                  Q     Not him, no.

20                  A     Did she have a pretty face?

21                  Q     What prompted your opinion about that, about  
22 what his role was --

23                  A     She does have a pretty face.

24                  Q     I'm not disputing that. I'm just trying to  
25 find out why did you mention that before you clarified.

1           A     It's my technique of responding at  
2     depositions.

3           Q     Your technique. Was it something that he had  
4     mentioned to you?

5           A     Was it something that he has mentioned to me?

6           Q     Yes.

7           A     He gave me some of her background, that she  
8     was an anchor woman on television and I presumed that  
9     she had a pretty face.

10          Q     Do you know who pays Mr. Serrano or Mr.  
11     Newton?

12          A     Who pays them?

13          Q     Yes.

14          A     Yes.

15          Q     You do know.

16          A     The general partners pays them or will pay  
17     them.

18          Q     Okay. And when did you first speak to Joyce  
19     Morgan about this matter?

20          A     Sometime in 1989.

21          Q     Any month?

22          A     Sometime in November, I think.

23          Q     Okay, November?

24          A     November, September, October.

25          Q     Of 1989?

1           A     Yes.

2           Q     You are or were an investor in three other  
3 partnerships?

4           A     Yes.

5           Q     Okay. Along with your investments, was there  
6 the same type of parity in equity interest, 20-40-40?

7           A     Yes.

8           Q     And that was basically between you,  
9 Rothschild and a general partner. Is that correct?

10          A     Correct.

11          Q     And who set those up?

12          A     The percentages?

13          Q     Yes.

14          A     I had discussed with George and Joyce Morgan  
15 that originally I would want to have 50 percent. But  
16 it was suggested to me 20-40-40 and I felt that 20-40-  
17 40 was close enough.

18          Q     Okay. And then each of those applications  
19 are or were you pledging the same amount?

20          A     Always the same amount. Manhauken may have  
21 been more money.

22          Q     Would you have a copy of the partnership  
23 agreement?

24          A     No.

25          Q     Could you turn to Page Three of that